

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CHARLENE JOHNSOS,

Plaintiff,

v.

FANNING HOWEY ASSOCIATES, INC.,

Defendant.

COMPLAINT FOR UNEQUAL PAY IN VIOLATION OF 29 U.S.C. §206(d).
THE EQUAL PAY ACT

Charlene Johnsos, by and through her attorney, Aaron B. Maduff of Maduff & Maduff LLC, complains against Defendant, Fanning Howey Associates, Inc. (hereafter “FHAI”) as follows:

Introduction

1. Defendant had as many as nine offices across the country. The highest position in each office is the Executive Director. Plaintiff, female, was the Executive Director for Defendant’s Oakbrook, Illinois Office. Plaintiff was doing substantially the same work as all other Executive Directors. From approximately 2013-2014, the Novi, Michigan Office also had a female Executive Director. She was making considerably less than Plaintiff. All other Executive Directors were male, all had lesser educational qualifications, and all were paid substantially more money — average difference of nearly \$35,000.

Parties

2. Plaintiff, Charlene Johnsos (“Johnsos” or “Plaintiff”), is a female citizen of the United States who at all relevant times resided within the territorial jurisdiction of the United States District Court for the Northern District of Illinois. At all relevant times, Plaintiff was an employee within the meaning of 28 U.S.C. § 203(e).

3. Defendant, Fanning Howey Associates, Inc., (“FHAI”) is a corporation which at all relevant times regularly conducted business within the territorial jurisdiction of the United

States District Court for the Northern District of Illinois. At all relevant times, Defendant FHAJ was an employer within the meaning of 29 U.S.C. § 203(d).

Jurisdiction

4. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331, as this claim involves a federal question brought under 29 U.S.C. §206(d), (The Equal Pay Act).

Venue

5. Venue is proper in this district pursuant to 28 U.S.C. §1391(b) because at all relevant times, Defendant regularly conducted business in this district and a substantial part of the events or omissions giving rise to the claim occurred in this district.

Facts

6. FHAJ is an architectural and engineering firm.
7. FHAJ has and/or had offices in the following cities
 - a. Alexandria, Virginia;
 - b. Casper, Wyoming;
 - c. Celina, Ohio;
 - d. Dublin, Ohio;
 - e. Indianapolis, Indiana;
 - f. Novi, Michigan;
 - g. Oakbrook, Illinois (2008 – 2017);
 - h. Raleigh, North Carolina; and
 - i. South Bend, Indiana.
8. Each office is/was led by an Executive Director.
9. From November of 2011 to Jul of 2017, Plaintiff was the Executive Director of the Chicago Office.
10. The Novi, Michigan Office had a female Executive Director between 2013 and 2014.
11. At all relevant times, Plaintiff (and the 2013-2014 Novi Director) were the only female Executive Directors.
12. Plaintiff was paid an annual salary of \$90,000.
13. The female Novi Director was paid even less.

14. All other Executive Directors were male.
15. All other Executive Directors were paid more money than Plaintiff.
16. The average annual salary of the other Executive Directors nearly \$125,000.
17. The highest paid Executive Director at any time was making in excess of \$135,000.
18. Plaintiff had a male assistant who was also paid \$90,000.

Demand for Relief for Unequal Pay
in Violation of 29 U.S.C. §206(d)
(The Equal Pay Act)

19. Plaintiff restates and re-alleges paragraphs 1 through 18 as paragraph 19 of this Demand for Relief.

20. By virtue of the foregoing, Defendant violated The Equal Pay Act by paying Plaintiff, a female, less than her male colleagues for substantially the same work.

21. As a result of Defendant's unlawful acts, Plaintiff has suffered damages.

22. Defendants' violations willful.

WHEREFORE, Plaintiff, Charlene Johnsos, respectfully requests that this Honorable Court enter judgment in her favor and against Defendant Fanning Howey Associates, Inc., for back pay, liquidated damages, attorneys' fees and costs, and for such other and further relief this Court deems just and equitable.

PLAINTIFF DEMANDS A TRIAL BY JURY

Respectfully submitted,
Charlene Johnsos

By: /s/ AARON B. MADUFF

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